

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 22-CR-60242-SINGHAL/DAMIAN

UNITED STATES OF AMERICA

vs.

TSVIA KOL,

Defendant.

FACTUAL PROFFER

The United States Attorney's Office for the Southern District of Florida ("this Office") and TSVIA KOL (the "Defendant") agree that, were this case to proceed to trial, the United States would prove beyond a reasonable doubt the following facts, among others, which occurred in the Southern District of Florida:

1. On November 3, 2020, the United States Postal Inspection Service ("USPIS") obtained a federal search warrant for a package destined for Coral Gables, Florida and inside found 1,321.2 grams of methamphetamine.
2. On November 12, 2020, law enforcement attempted a controlled delivery of the package after replacing the methamphetamine with "sham" drugs. In early November, a woman named "I.L." contacted the postal service about the package.
3. Law enforcement called "I.L." back and told her the package had made its way to a post office in Coral Gables and was ready for pickup.
4. Approximately five hours later, "I.L." appeared at that post office to pick up the package. A USPIS agent acting in an undercover capacity gave "I.L." the package.

5. When "I.L." reached her car in the parking lot, a DEA agent approached her, identified himself, and stated that he wanted to talk to her about the package she'd just picked up.
6. At that point, "I.L." told officers in that she was the courier for the package and that she was supposed to call a number and then meet with an Israeli woman saved in her phone as "Sapir Kol," from whom she had bought small quantities of personal use methamphetamine at a club.
7. "I.L." stated that she had picked up several packages for the Defendant and received \$300-\$400 for each. She expected to be paid \$300 for this one. "I.L." then conducted several recorded controlled calls, three of which were with the Defendant and one of which was with a contact from "Mexico" that the Defendant arranged. On these calls, the Defendant told "I.L." not to open the box and then discussed precisely where to meet in Hallandale Beach, Florida for the transfer.
8. At approximately 6:00 p.m. that same day, about two hours after picking up the package from the post office and now acting at the direction of law enforcement, "I.L." met the Defendant in a Wendy's parking lot in Hallandale Beach, Florida. Law enforcement surveillance witnessed "I.L." hand the package to the Defendant, who then placed the package on the driver's seat of her car. At that point, law enforcement approached and detained both women.
9. A search of the Defendant's car revealed a postal service receipt with the tracking number of the package of methamphetamine inside.
10. The Defendant's cell phone contained calls to and from "I.L." throughout the day, as well as texts regarding methamphetamine transactions.

11. Inside the Defendant's one-bedroom apartment, officers found 584.342 grams of methamphetamine scattered around the apartment in several baggies and several pipes and scales. They also found dozens of fentanyl pills weighing 58.73 grams in an open safe inside the single bedroom, as well as other drugs consistent with personal use, including several oxycodone pills, a bag of mushrooms, and three MDMA pills scattered throughout the apartment.
12. The total amount of methamphetamine, a Schedule II controlled substance, seized from the Defendant on November 12, 2020 was 1,905.542 grams.
13. All drug quantities and purities in this factual proffer come from lab-confirmed results from the DEA Southeast Laboratory.
14. The facts described above are not intended to be a complete recitation of the facts of this case and are merely intended to form a basis for the undersigned defendant's knowing, willful, and intentional plea of guilty.

MARKENZY LAPOINTE
UNITED STATES ATTORNEY

Date:

8/30/23

By:


 For

ALEXANDRA D. COMOLLI
ASSISTANT UNITED STATES ATTORNEY

Date:

8/30/23

By:

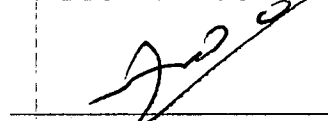


JASON KREISS, ESQ.
ATTORNEY FOR DEFENDANT

Date:

8/30/23

By:



TSVIA KOL
DEFENDANT